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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA,)	Case No.
)	
Plaintiff,)	<u>COUNT 1:</u>
)	CONSPIRACY TO DISTRIBUTE
vs.)	CONTROLLED SUBSTANCES
)	Vio. of 21 U.S.C. § 841(a)(1) and
BRANDON HAYNES,)	(b)(1)(B), (C) & (D)
WILLIE WILSON,)	
DONTE EDWARDS,)	<u>COUNT 2:</u>
ANTHONY GADSEN,)	POSSESSION WITH INTENT TO
JOE POWELL,)	DISTRIBUTE CONTROLLED
NATASHA WOLFE, and)	SUBSTANCES
JOLEEN MALAMUTE,)	Vio. of 21 U.S.C. § 841(a)(1) and
)	(b)(1)(B), (C) & (D)
Defendants.)	
)	<u>COUNT 3:</u>
)	POSSESSION OF A FIREARM IN
)	FURTHERANCE OF A DRUG
)	OFFENSE
)	Vio. of 18 U.S.C. § 924(c)(1)(A)(i)
)	
)	

) COUNT 4:
) MAINTAINING DRUG INVOLVED
) PREMISES
) Vio. of 21 U.S.C. § 856(a)(1) & (b)
)
) CRIMINAL FORFEITURE
) ALLEGATION:
) DRUG PROCEEDS & FACILITATION
) 21 U.S.C. §§ 853(a)(1) and (2)
)

INDICTMENT

The Grand Jury charges that:

COUNT 1

Between on or about February 1, 2009, and on or about November 1, 2010, both dates being approximate and inclusive, in the District of Alaska, the defendants, BRANDON HAYNES, WILLIE WILSON, DONTE EDWARDS, ANTHONY GADSEN, JOE POWELL, NATASHA WOLFE and JOLEEN MALAMUTE, did knowingly and intentionally conspire, confederate, and agree with each other, and with others known and unknown to the Grand Jury, to commit the following offenses:

(a) to distribute, and possess with intent to distribute, 500 grams or more of a mixture or substance containing a detectable amount of cocaine, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B);

(b) to distribute, and possess with intent to distribute, detectable amounts of heroin, cocaine base, and 3,4 Methylene-dioxymethamphetamine (“ecstasy”), in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C); and

(c) to distribute, and possess with intent to distribute, a detectable amount of marijuana, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(D).

All of which is in violation of Title 21, United States Code, Sections 846 and 841(b)(1)(B), (b)(1)(C), (b)(1)(D).

COUNT 2

On or about February 19, 2010, in the District of Alaska, the defendants, BRANDON HAYNES, WILLIE WILSON, DONTE EDWARDS, ANTHONY GADSEN, NATASHA WOLFE and JOLEEN MALAMUTE, did knowingly and intentionally possess with intent to distribute controlled substances, to wit: 500 grams or more of a mixture and substance containing a detectable amount of cocaine; and detectable amounts of heroin; cocaine base; 3,4 Methylene-dioxymethamphetamine (“ecstasy”); and marijuana.

All of which is in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B), (C), and (D).

COUNT 3

On or about February 19, 2010, in the District of Alaska, the defendants, BRANDON HAYNES, WILLIE WILSON, DONTE EDWARDS, ANTHONY

GADSEN, NATASHA WOLFE and JOLEEN MALAMUTE, did knowingly possess the following firearms in furtherance of the drug trafficking crimes described in Counts 1 and 2 of this indictment: one Maverick 12 gauge shotgun, serial number S/W MV583072, and one Taurus .38 caliber revolver, serial number ZG63057.

All of which is in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

COUNT 4

Between on or about December 1, 2008, and on or about February 19, 2010, in the District of Alaska, the defendants, BRANDON HAYNES and JOLEEN MALAMUTE, did knowingly open, lease, rent, use, and maintain 5260 Fouts Drive, in Fairbanks, Alaska, for the purpose of manufacturing, distributing, and using controlled substances.

All of which is in violation Title 18, United States Code, Section 856(a)(1) and (b).

CRIMINAL FORFEITURE ALLEGATION DRUG PROCEEDS & FACILITATION

Upon conviction of the controlled substance offense alleged in Count 1 of this Indictment, defendants BRANDON HAYNES, WILLIE WILSON, DONTE EDWARDS, ANTHONY GADSEN, JOE POWELL, NATASHA WOLFE and JOLEEN MALAMUTE shall forfeit to the United States any property constituting, or derived from, any proceeds the defendant obtained, directly or indirectly, as the result of said offense, pursuant to Title 21, United States Code, Section 853(a)(1), and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of,

said offense, pursuant to Title 21, United States Code, Section 853(a)(2), including without limitation to the following property:

- A. \$52,225.00 in United States currency and money orders;
- B. \$14,098.00 in United States currency;
- C. Taurus .38 revolver, serial number ZG63057;
- D. Maverick 12 gauge shotgun, serial number S/W MV583072;
- E. Ruger Mini-14 .223 rifle, serial number 580-95265;
- F. Two Safariland ballistic vests;
- G. Second Chance ballistic vest;
- H. Point Blank body armor, serial number 20-19729;
- I. 1990 Chevrolet Caprice, VIN 1G1BL547XLA160303;
- J. 2004 Cadillac CTS-REC, VIN 1G6DM577740151965;
- K. 2006 Yamaha motor scooter, VIN LPRSA30A46A103001;
- L. One Gucci men's wristwatch model #12130176; and
- M. Dental jewelry: 2 silver in color "grills" with embedded gems.

All of which is in accordance with Title 21, United States Code, Sections 853(a)(1), (a)(2), and (d), (p), and Rule 32.2(a), Federal Rules of Criminal Procedure.

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MONEY JUDGMENT AND SUBSTITUTE ASSETS

In addition to the foregoing forfeiture allegations, the United States additionally alleges that it is entitled to a money judgment and, if warranted, recourse against substitute assets:

a. A sum of money equal to the total amount of money equal to the total proceeds of the drug charge alleged in Counts 1-2.

b. The defendants shall forfeit substitute property, pursuant to Title 21, United States Code, Section 853(p), if the property described in the Criminal Forfeiture allegation, above, or any portion thereof, cannot be located upon the exercise of due diligence; has been transferred, sold to or deposited with a third party; has been placed beyond the jurisdiction of the court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty.

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All of which is in accordance with Title 21, United States Code, Section 853(p),
and Rule 32.2(a), Federal Rules of Criminal Procedure.

A TRUE BILL.

s/ Grand Jury Foreperson
GRAND JURY FOREPERSON

s/ Frank V. Russo for
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s/ Karen L. Loeffler
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